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August 19, 2022

**VIA ECF**

Hon. John G. Koeltl, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl St.  
New York, NY 10007

Application granted. SO ORDERED.

August 22, 2022     /s/ John G. Koeltl  
New York, NY     John G. Koeltl, U.S.D.J.

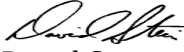
**Re:    Abreu v. UI Global Brands LLC**  
**Case No. 22-cv-1793 (JGK)(DCF)**

Dear Judge Koeltl:

We represent defendant UI Global Brands LLC in the above-referenced matter, and we submit this letter with the consent of plaintiff's counsel. In response to defendant's June 21 pre-motion letter, Your Honor issued an Order on June 28 making defendant's anticipated motion to dismiss due by August 5. Unfortunately, in the press of other work, we did not submit our motion papers as ordered. Therefore, we respectfully request for the first time a *nunc pro tunc* extension of time until August 23 to file defendant's motion. Correspondingly, we respectfully request that plaintiff be given until September 6 to respond, and that defendant be given until September 13 to file a reply. Because defendant intends to file a dispositive motion, we respectfully request that all pre-initial conference submissions be adjourned *sine die*.

We thank the Court for its attention to this matter. We are available at Your Honor's convenience if the Court has any questions.

Respectfully submitted,

  
David Stein

cc: Edward Y. Kroub, Esq. (via ECF)